

## **EXHIBIT D**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

WOLFRAM ARNOLD, ERIK FROESE,  
TRACY HAWKINS, JOSEPH KILLIAN,  
LAURA CHAN PYTLARZ, and ANDREW  
SCHLAIKJER,

Plaintiffs,

v.

X CORP. f/k/a TWITTER, INC., X  
HOLDINGS COPR. f/k/a X HOLDINGS I,  
INC and ELON MUSK,

Defendants.

C.A. No. 23-cv-528-CFC-CJB

**[PROPOSED] ORDER GRANTING MOTION TO STAY DISCOVERY PENDING  
RESOLUTION OF DEFENDANTS' MOTIONS TO DISMISS**

Before the Court is Defendants X. Corp. f/k/a Twitter, Inc., X Holdings Corp. f/k/a X Holdings I, Inc. and Elon Musk's Motion to Stay Discovery Pending Resolution of Defendants' Motions to Dismiss (D.I. 14-18). After considering the Motion and the response, IT IS HEREBY ORDERED, this \_\_\_\_\_ day of \_\_\_\_\_, 2023 that:

- 1) Defendants' Motion is **GRANTED**; and
- 2) All discovery and disclosure obligations under the applicable local and federal rules in this Action, as applied to the parties and any non-parties, are hereby stayed until there is a final ruling on Defendants' Motions to Dismiss.

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The Honorable Christopher J. Burke